

Date	Matter	Lwyr	Hours	Rate	Amount	Inv#	Explanation
3/1/2012	3308.27	GPR	0.10	200.00	20.00	23245	Coordinate the preparation of Petition against the proper legal entity for Simple HR.
3/7/2012	3308.27	KAW	0.70	200.00	140.00	23245	Review and finalize Petition for filing in Oklahoma County District Court (.5); review and finalize Notice of Exemption from Filing Fees (.1); review and finalize Entry of Appearance for filing in Oklahoma County District Court (.1).
3/7/2012	3308.27	JOC	0.30	200.00	60.00	23245	Attention to filing of action v. Pyramid.
4/3/2012	3308.27	KAW	0.20	200.00	40.00	24322	Review inquiry from counsel for Simple HR regarding matter (.2).
4/3/2012	3308.27	JOC	0.20	200.00	40.00	24322	Receive and review email correspondence regarding Robert Byerts / Simple HR / Pyramid regarding claim of monies on deposit.
4/3/2012	3308.27	JOC	0.80	200.00	160.00	24322	Draft email correspondence to Kris Williams regarding PEO Pyramid Diversified Services and contact from representative of Pyramid / Simple HR (.30); review file regarding Simple HR collateral and amounts owed (.50).
4/3/2012	3308.27	GPR	0.60	200.00	120.00	24322	Telephone call with Kris Williams regarding prior lawsuit with Simple HR (.2); begin review of pleadings in prior, pending action (.4).
4/4/2012	3308.27	JOC	0.30	200.00	60.00	24322	Receive and review email correspondence from Kris Williams regarding her call from Simple / Pyramid Bill Lindsley.
4/4/2012	3308.27	JOC	0.60	200.00	120.00	24322	Receive and review email correspondence from Robert Byerts with Order regarding Stay as to Park Avenue, Order Lifting Stay for a Limited Purpose, Proof of Claim and other documents.
4/4/2012	3308.27	JOC	0.30	200.00	60.00	24322	Draft email correspondence to Assistant Receiver Mark Tharp and Kris Williams regarding assertions of Simple HR counsel.
4/4/2012	3308.27	JOC	0.70	200.00	140.00	24322	Continue review of file for call with Simple HR legal counsel today.
4/4/2012	3308.27	JOC	0.30	200.00	60.00	24322	Return call to Simple HR legal counsel.
4/13/2012	3308.27	JOC	0.30	200.00	60.00	24322	Receive and review email correspondence from Kris Williams regarding call with in-house adjuster regarding Simple HR claims.
4/13/2012	3308.27	JOC	1.80	200.00	360.00	24322	Telephone call with Robert Byerts, counsel for Simple HR regarding lawsuit and issues (.8); attention to follow up on Simple HR call (1.0).
4/13/2012	3308.27	GPR	0.60	200.00	120.00	24322	Begin review and analysis of issues at issue in federal lawsuit brought by Simple HR prior to insolvency and review of judicial opinion by Judge Heaton holding that PHI's repayment obligation on the surplus notes was triggered prior to insolvency and that PEO had not direct cause of action against the insurer.
4/16/2012	3308.27	KAW	0.20	200.00	40.00	24322	Review status of matter, delivery of summons and action to take to move the matter forward in preliminary stages of the filed action (.2).
4/16/2012	3308.27	JOC	0.20	200.00	40.00	24322	Review status of service and pleading deadlines and analysis regarding cause of action.
4/16/2012	3308.27	GPR	0.40	200.00	80.00	24322	Attention to service of process and status of settlement discussions with defendant.
4/18/2012	3308.27	JOC	0.80	200.00	160.00	24322	Telephone call with Assistant Receiver Mark Tharp and Kris Williams regarding Simple HR call for credit and regarding other issues (.8).
4/19/2012	3308.27	JOC	0.30	200.00	60.00	24322	Receive and review email correspondence from Simple attorney Robert Byerts (.20); draft email to Elaine Andrew for proof of service (.10).

4/19/2012	3308.27	JOC	0.80	200.00	160.00	24322	Receive and reply to email correspondence from Robert Byerts regarding review of information and extension (.30); draft email correspondence to Assistant Receiver Mark Tharp (.20); begin review of file responsive to Mr. Byerts (.30).
4/19/2012	3308.27	JOC	0.30	200.00	60.00	24322	Receive and review email correspondence from Simple HR attorney Robert Byerts and attention to same.
4/24/2012	3308.27	JOC	0.40	200.00	80.00	24322	Receive and review email correspondence from Kris Williams regarding communication from Mr. Lindsley of today.
4/26/2012	3308.27	KAW	0.20	200.00	40.00	24322	Receive and review Notice of Removal of action to the US District Court, Western District.
4/26/2012	3308.27	KAW	1.20	200.00	240.00	24322	Receive and review Order, Entry of Appearance of Defendant's counsel, Receipt, Motion to Appear Pro Hac Vice, and Notice of Related or Companion Case.
4/26/2012	3308.27	GPR	0.40	200.00	80.00	24322	Receive and review multiple notices of initial filings.
4/27/2012	3308.27	KAW	0.20	200.00	40.00	24322	Receive and review Notice of Filing Notice of Removal.
5/1/2012	3308.27	KAW	0.20	200.00	40.00	24270	Receive and review Amended Order for Status Conference.
5/1/2012	3308.27	KAW	0.20	200.00	40.00	24270	Receive and review Order granting admission pro hac vice.
5/1/2012	3308.27	KAW	0.20	200.00	40.00	24270	Receipt and review of communications from Mr. Byert regarding case status and Court handling (.2).
5/1/2012	3308.27	GPR	0.40	200.00	80.00	24270	Receive and review Court's Order requiring filing of Joint Status Report by Sunday, May 6, with a hearing to be held on May 8 (.2); receive and review email correspondence from opposing counsel regarding phone conference (.2).
5/2/2012	3308.27	KAW	0.50	200.00	100.00	24270	Receive and review Answer of Pyramid Diversified Services, Inc. d/b/a Simple HR.
5/2/2012	3308.27	JOC	0.30	200.00	60.00	24270	Review and attention to email correspondence from Robert Byerts regarding conference.
5/2/2012	3308.27	GPR	0.80	200.00	160.00	24270	Receive and review Defendant's Answer and Counterclaim (.4); attention to quickly approaching Sunday deadline for filing of a Status Report and conference with opposing counsel (.4).
5/3/2012	3308.27	KAW	0.40	200.00	80.00	24270	Multiple communications with Mr. Byerts, counsel for Pyramid, regarding Court Order, discovery conference and Joint Status Report (.4).
5/3/2012	3308.27	JOC	1.20	200.00	240.00	24270	Receive email correspondence from Robert Byerts with Motion to Appear by Telephone at Status Conference (.30); telephone call to Robert Byerts regarding appearance and regarding information exchange (.30); draft email correspondence to Robert Byerts confirming our non-objection to his appearance by telephone and his non-objection to our appearance by telephone at the Status Conference (.30); receive email correspondence from Robert Byerts with Defendant's draft Joint Status Report and attention to same (.30).
5/3/2012	3308.27	JOC	0.40	200.00	80.00	24270	Receive and review email correspondence from Andrew Downing, including review of April 6, 2010 Amended Joint Status Report and Discovery Plan; and related emails.
5/4/2012	3308.27	KAW	3.90	200.00	780.00	24270	Review Defendant's proposed Joint Status Report (.4); review previous Pyramid litigation docket and Orders in preparation for discovery conference with Mr. Byerts (1.1); conduct discovery conference with Mr. Byerts and review Joint Status Report issues with him (.6); revise proposed Joint Status Report pursuant to conference and in accordance with Western District practice and rules (.7); review of Skilstaff/Pyramid documents, exhibits and Mark Tharp letter (1.1).
5/4/2012	3308.27	JOC	0.30	200.00	60.00	24270	Review of status regarding Status Conference and history of communications between Receiver and counsel for PEO.

5/4/2012	3308.27	GPR	0.60	200.00	120.00	24270	Attention to prioritizing case for production of documents (.1); telephone call with Kris Williams regarding priority (.1); analysis of claims and issues in pending action (.2); attention to imminent deadline for the filing of a Joint Status Report and Status Conference (.2).
5/6/2012	3308.27	KAW	0.20	200.00	40.00	24270	Communications with Mr. Byerts regarding his filing of the Joint Status Report, as promised, and the Court's unusual Sunday deadline (.2).
5/7/2012	3308.27	JOC	0.30	200.00	60.00	24270	Receive and review email correspondence from Andrew Downing and Andrew Spicher.
5/8/2012	3308.27	GPR	1.20	200.00	240.00	24270	Prepare for and in status conference regarding Complaint filed and companion case brought by Simple HR (.8); attention to correspondence related to scheduling of mediation (.4).
5/9/2012	3308.27	JOC	0.90	200.00	180.00	24270	Review materials and presents during Court Status Conference and post-conference conference with Keith Wilkes regarding actions and mediation.
5/9/2012	3308.27	JOC	0.20	200.00	40.00	24270	Receive and review email correspondence from Simple HR attorney regarding mediation.
5/10/2012	3308.27	JOC	0.80	200.00	160.00	24270	Receive and review email correspondence from Simple HR attorney Robert Byerts regarding mediation and attention to same (.50); draft email correspondence to Robert Byerts regarding mediation (.30).
5/10/2012	3308.27	JOC	0.40	200.00	80.00	24270	Attention to mediation, including receive and reply to two email correspondence from Robert Byerts and draft email correspondence to Mark Tharp.
5/10/2012	3308.27	GPR	0.20	200.00	40.00	24270	Attention to mediation and preparation of mediation statement.
5/11/2012	3308.27	JOC	0.20	200.00	40.00	24270	Telephone call to Paul Wilkening regarding mediation / Rothman.
5/14/2012	3308.27	KAW	0.20	200.00	40.00	24270	Receive and review Order regarding mediation.
5/14/2012	3308.27	KAW	0.80	200.00	160.00	24270	Receive and review Joint Status Report and Discovery Plan.
5/15/2012	3308.27	JOC	0.50	200.00	100.00	24270	Attention to mediation, including receive correspondence from Oklahoma Mediation / Arbitration Service, dictate email correspondence to Mark Tharp regarding mediation and preparation (.30); attention to preparation of mediation statement (.20).
5/15/2012	3308.27	JOC	0.20	200.00	40.00	24270	Receive and review email correspondence from Andrew Downing with Order.
5/17/2012	3308.27	KAW	0.30	200.00	60.00	24270	Communications from Mr. Byerts and Ms. Williams regarding mediation (.3).
5/17/2012	3308.27	JOC	0.30	200.00	60.00	24270	Receive and reply to email correspondence from Simple attorney, Robert Byerts.
5/17/2012	3308.27	JOC	0.30	200.00	60.00	24270	Review documents in preparation for telephone conference with Simple attorney Byerts and preparation of mediation statement.
5/17/2012	3308.27	JOC	0.30	200.00	60.00	24270	Review of records to determine positions of Simple / Pyramid.
5/17/2012	3308.27	JOC	0.60	200.00	120.00	24270	Attention to collections and allocation of collateral, for purposes of collections.
5/17/2012	3308.27	JOC	0.20	200.00	40.00	24270	Review issue in Judge Heaton case.
5/17/2012	3308.27	GPR	0.20	200.00	40.00	24270	Attention to issues regarding assignment of claims from PACA/Skilstaff to Simple HR.
5/21/2012	3308.27	JOC	0.50	200.00	100.00	24270	Receive and review email correspondence from Kris Williams regarding various issues and attachments / spreadsheet.
5/21/2012	3308.27	JOC	0.60	200.00	120.00	24270	Review Materials
5/21/2012	3308.27	JOC	0.90	200.00	180.00	24270	Telephone call Assistant Receiver Mark Tharp and Kris Williams.
5/22/2012	3308.27	JOC	0.70	200.00	140.00	24270	Review documents in preparation for mediation.

5/22/2012	3308.27	JOC	0.80	200.00	160.00	24270	Review records and dictate letter to Assistant Receiver Mark Tharp regarding investigation and preparation for mediation.
5/23/2012	3308.27	JOC	1.10	200.00	220.00	24270	Telephone call to Robert Byerts regarding multiple issues.
5/23/2012	3308.27	JOC	0.30	200.00	60.00	24270	Receive and review email correspondence from Greg Reilly regarding reply to Simple HR's counterclaim.
5/23/2012	3308.27	GPR	2.10	200.00	420.00	24270	Analysis of Order entered after joint status conference with regard to holding actions in abeyance until after mediation and formulate strategy for extending answer deadline (.4); email correspondence with Robert Byerts regarding request to extend reply deadline (.2); conduct legal research and prepare Application to Extend Deadline for filing Reply (1.5).
5/24/2012	3308.27	JOC	1.00	200.00	200.00	24270	Review notes from call with Robert Byerts and dictate letter to Mark Tharp.
5/28/2012	3308.27	JOC	1.00	200.00	200.00	24270	Revise evidence letter to Assistant Receiver Mark Tharp regarding mediation preparation and email to Assistant Receiver Mark Tharp and Kris Williams.
5/30/2012	3308.27	KAW	0.30	200.00	60.00	24270	Review case status and removal to Western District and manage progress of litigation (.3).
5/30/2012	3308.27	JOC	1.00	200.00	200.00	24270	Telephone call with Assistant Receiver Mark Tharp and Kris Williams regarding mediation preparation.
6/4/2012	3308.27	JOC	1.40	200.00	280.00	24550	Review materials from Assistant Receiver Mark Tharp regarding Pyramid / Simple HR collateral and surplus loan.
6/5/2012	3308.27	JOC	0.30	200.00	60.00	24550	Attention to preparation for mediation.
6/5/2012	3308.27	GPR	1.00	200.00	200.00	24550	Telephone call with Kris Williams regarding overview of Simple HR relationship with PACA/Skillstaff and Providence (.3); begin analysis of documents for preparation of mediation statement (.7).
6/6/2012	3308.27	JOC	0.80	200.00	160.00	24550	Telephone call with Mark Tharp and Kristine Williams regarding mediation.
6/6/2012	3308.27	JOC	0.50	200.00	100.00	24550	Mediation preparation, including review of Simple HR lawsuit pleadings and mediation materials from Assistant Receiver Mark Tharp.
6/6/2012	3308.27	JOC	0.80	200.00	160.00	24550	Review pleadings from Simple HR suit, in preparation for mediation.
6/6/2012	3308.27	GPR	4.50	200.00	900.00	24550	Continue analysis and preparation of mediation statement.
6/7/2012	3308.27	JOC	0.30	200.00	60.00	24550	Review of federal case pleadings and orders in Simple case.
6/7/2012	3308.27	GPR	3.70	200.00	740.00	24550	Continue analysis and preparation of mediation statement
6/8/2012	3308.27	JOC	2.90	200.00	580.00	24550	Mediation Statement.
6/11/2012	3308.27	JOC	1.70	200.00	340.00	24550	Continue review of materials and drafting of Mediation statement.
6/12/2012	3308.27	JOC	1.20	200.00	240.00	24550	Revise draft Mediation Statement.
6/12/2012	3308.27	JOC	6.20	200.00	1240.00	24550	Drafting on Mediation Statement, including review of materials from Assistant Receiver Mark Tharp and Kris Williams.
6/12/2012	3308.27	GPR	2.70	200.00	540.00	24550	Review of pleadings for potential arguments to include in mediation statement (1.5); continue analysis of arguments in draft mediation statement (1.2).
6/13/2012	3308.27	JOC	1.20	200.00	240.00	24550	Office conference with Assistant Receiver Mark Tharp to go over draft Mediation Statement (.6); office conference with Assistant Receiver Mark Tharp and Receivership in-house Legal Counsel Paul Wilkening to discuss mediation strategy and authority (.5).

6/13/2012	3308.27	JOC	2.90	200.00	580.00	24550	Continue adding material to draft Mediation Statement for mediation tomorrow (.4); receive and review email correspondence from Kris Williams with comments/additions to draft (.3); review Judge Heaton's decision for reference to OID approval of surplus notes (.3); review 36 O. S. section 2125 regarding OID approval of loans (.3); revise draft Mediation Statement accordingly (1.6).
6/13/2012	3308.27	JOC	1.50	200.00	300.00	24550	Review Mediation Exhibits, including Surplus Notes and Exhibits 7-25.
6/13/2012	3308.27	JOC	3.70	200.00	740.00	24550	Office conference with Assistant Receiver Mark Tharp and review materials for mediation tomorrow, including review email correspondence from Robert Byers with documents attached.
6/13/2012	3308.27	GPR	2.20	200.00	440.00	24550	Analysis of Supreme Court opinion regarding the legal position of a receiver in an action brought on behalf of the insolvent estate (.2); analysis of other authorities regarding necessity of OID approval of surplus loans and inability for holder of note to use such amount to setoff of any liability owed by the holder (.3); continued strategy and preparation for settlement conference (1.7)
6/14/2012	3308.27	KAW	0.20	200.00	40.00	24550	Receipt and review of exhibit with Wayne Starks emails for use in the matter (.2).
6/14/2012	3308.27	JOC	0.60	200.00	120.00	24550	Mediation preparation (.5); telephone call from Kris Williams (.1).
6/14/2012	3308.27	JOC	6.00	200.00	1200.00	24550	To Mediation with Oklahoma Medation and Arbitration Service Rothman and Simple HR Bill Lindsley and Robert Byerts.
6/14/2012	3308.27	JOC	1.00	200.00	200.00	24550	Attention to discovery and prosecution of case, including office conference with Assistant Receiver Mark Tharp to review new information learned in mediation from Simpel HR.
6/14/2012	3308.27	JOC	0.30	200.00	60.00	24550	Receive and review email correspondence from Kris Williams.
6/14/2012	3308.27	JOC	0.00	200.00	0.00	24550	Stark regarding Simple collateral.
6/14/2012	3308.27	GPR	1.20	200.00	240.00	24550	Attention to mediation proceedings and information learned regarding Defendant's position as well as oral communications made between principals of the insurance company and principals of Defendant (.6); strategize regarding preparation and contents of a report to the Court regarding mediation (.2); strategize regarding written and deposition discovery (.4).
6/15/2012	3308.27	KAW	0.30	200.00	60.00	24550	Review case and litigation status and outline next step(s) for prosecution of PEO matter (.3).
6/19/2012	3308.27	GPR	0.30	200.00	60.00	24550	Continue analysis of Defendant's existing and anticipated claims against the Receiver related to allegations made by the Receiver against principals of the insolvent insurance companies for alleged theft from policy holders and how such allegations affect the Receiver's efforts to collect amounts due from policy holders (.3).
6/20/2012	3308.27	GPR	3.20	200.00	640.00	24550	Prepare Report to the Court regarding mediation (.8); begin analysis of counterclaims and preparation of reply to the same (2.4).
6/21/2012	3308.27	KAW	0.30	200.00	60.00	24550	Review discovery length issue in consideration of anticipated consolidation of cases by Judge Heaton (.3).
6/21/2012	3308.27	JOC	0.20	200.00	40.00	24550	Review status of matter following failed mediation.
6/21/2012	3308.27	JOC	0.90	200.00	180.00	24550	Review status regarding reply to Simple counterclaim (.20); review Receiver's Report to the Court regarding mediation (.20); attention to scheduling issues (.50).

6/21/2012	3308.27	GPR	2.40	200.00	480.00	24550	Continue analysis of counterclaims and preparation of reply (2.0); analysis regarding time necessary to conduct discovery (.4).
6/22/2012	3308.27	GPR	3.60	200.00	720.00	24550	Continued analysis of counterclaim and preparation of reply.
6/25/2012	3308.27	JOC	0.20	200.00	40.00	24550	Attention to draft status report and reply, as well as remand.
6/25/2012	3308.27	GPR	0.20	200.00	40.00	24550	Attention to need for filing Reply to Counterclaims and Report to the Court regarding failed mediation.
6/27/2012	3308.27	GPR	0.20	200.00	40.00	24550	Analysis regarding proposed allegations in status report related to confidential settlement communications.
6/28/2012	3308.27	GPR	4.10	200.00	820.00	24550	Continued analysis of Counterclaims and preparation of Reply.
6/30/2012	3308.27	GPR	4.00	200.00	800.00	24550	Finalization of Reply to Counterclaims (3.0); file Reply to Counterclaims (.2); revise and file entry of appearance in 2009 case (.4); final review and filing of Status Report Regarding Mediation in both cases (.4).
7/2/2012	3308.27	JOC	0.30	200.00	60.00	24686	Receive and review Notice from U.S. District Court for the Western District of Oklahoma.
7/3/2012	3308.27	KAW	0.30	200.00	60.00	24686	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
7/3/2012	3308.27	GPR	0.40	200.00	80.00	24686	Receive and review Court's Scheduling Order (.2); receive and review Chris Thrutchley's incorrect Motion to Withdraw and corrected Motion to Withdraw (.2)
7/17/2012	3308.27	KAW	0.20	200.00	40.00	24686	Prepare for meeting with Assistant Receiver to review litigation status, strategy and make recommendations.
7/18/2012	3308.27	KAW	0.20	200.00	40.00	24686	Meeting with Assistant Receiver to review case status, prosecution issues and strategy.
8/3/2012	3308.27	GPR	0.30	200.00	60.00	25275	Draft memorandum regarding status and tasks to be completed.
8/14/2012	3308.27	GPR	0.60	200.00	120.00	25275	Review Answer and Counterclaims and Proof of Claim to determine unique issues raised (.5); update litigation tracking matrix regarding unique issues and Proof of Claim filing (.1).
8/24/2012	3308.27	GPR	1.40	200.00	280.00	25275	Preparation of redacted UDS data for production.
8/27/2012	3308.27	GPR	0.40	200.00	80.00	25275	Analysis of case status in preparation for meeting with Judges Davis and Parrish (.2); review petition and Summary of Amounts Due spreadsheet and revise PEO litigation Matrix to accurately reflect amounts due and received (.2).
8/28/2012	3308.27	GPR	0.60	200.00	120.00	25275	Review of attorney fee reports and update Litigation Status Tracking Report in preparation for meeting with Judge Davis (.2); analysis and revisions to the Application to Reassign cases (.2); attention to service of Application including preparation of correspondence regarding Application (.2).
9/4/2012	3308.27	KAW	0.30	200.00	60.00	25927	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
9/12/2012	3308.27	JOC	0.40	200.00	80.00	25927	Analysis regarding remand and preparation of discovery.
9/12/2012	3308.27	GPR	0.20	200.00	40.00	25927	Attention to updating of litigation tracking spreadsheet to reflect current status of action (.1); strategize regarding tasks to be completed to move litigation forward (.1).
9/16/2012	3308.27	GPR	0.40	200.00	80.00	25927	Prepare strategic 30-day plan for advancing litigation (.4).
9/17/2012	3308.27	GPR	0.20	200.00	40.00	25927	Prepare and review email correspondence related strategic plan for approval and comment (.2).
9/20/2012	3308.27	KAW	0.30	200.00	60.00	25927	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
10/3/2012	3308.27	KAW	0.60	200.00	120.00	25732	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
10/23/2012	3308.27	KAW	0.30	200.00	60.00	25732	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.

10/23/2012	3308.27	JOC	0.40	200.00	80.00	25732	Attention to initiation of discovery.
10/23/2012	3308.27	GPR	0.20	200.00	40.00	25732	Overview of status of action and priority position on propounding written discovery.
10/25/2012	3308.27	GPR	0.20	200.00	40.00	25732	Update status tracking report with recent activity and next steps in litigation in preparation for meeting with Judge Davis.
11/1/2012	3308.27	KAW	0.30	200.00	60.00	26118	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
11/13/2012	3308.27	GPR	1.60	200.00	320.00	26118	Continue review of relevant documents and work on preparation of discovery requests.
11/15/2012	3308.27	KAW	0.30	200.00	60.00	26118	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
11/20/2012	3308.27	JOC	0.20	200.00	40.00	26118	Review status regarding response to motion to reassign and for partial consolidation and discovery draft due by Monday, November 26, 2012.
11/20/2012	3308.27	GPR	0.20	200.00	40.00	26118	Overview of status and strategize regarding finalization of draft discovery.
11/26/2012	3308.27	GPR	0.40	200.00	80.00	26118	Update and restructure Litigation Tracking status update with new developments (.2); prepare plan for action to be taken in the next thirty days (.2).
11/28/2012	3308.27	GPR	4.00	200.00	800.00	26118	Continue review of pleadings and documents (2.0); continue preparation of discovery requests to Simple HR (2.0).
11/30/2012	3308.27	GPR	2.00	200.00	400.00	26118	Continue work on discovery requests.
12/6/2012	3308.27	KAW	0.30	200.00	60.00	26613	Receive and review Revised Scheduling Order.
12/6/2012	3308.27	GPR	0.20	200.00	40.00	26613	Receive and review court's amended Scheduling Order.
12/11/2012	3308.27	KAW	0.30	200.00	60.00	26613	Receive and review Plaintiffs First Requests for Production of Documents to Defendant Providence Property & Casualty Insurance Co.
12/12/2012	3308.27	KAW	0.30	200.00	60.00	26613	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
12/12/2012	3308.27	JOC	0.10	200.00	20.00	26613	Review status regarding consolidation and discovery.
12/12/2012	3308.27	GPR	0.40	200.00	80.00	26613	Strategize regarding litigation status and tasks to be accomplished (.2); update litigation status tracking spreadsheet, including stated deadlines on tasks to be accomplished for provision to client (.2).
12/14/2012	3308.27	GPR	6.00	200.00	1200.00	26613	Continue analysis of documents and pleadings and prepare discovery requests.
12/17/2012	3308.27	KAW	1.00	200.00	200.00	26613	Receive and review Defendants First Requests for Production of Documents to Plaintiff State of Oklahoma, ex rel. John Doak Insurance Commissioner, as Receiver for Park Avenue Property & Casualty Insurance Company.
12/17/2012	3308.27	GPR	3.00	200.00	600.00	26613	Receive and review requests for production from Simple HR in both cases (.9); correspondence with Kris Williams regarding Requests for Production and Initial Disclosures in the 2009 lawsuit (.3); conduct research for initial disclosures provided by the company in the 2009 lawsuit (.4); telephone call with Kris Williams with detailed review of Simple HR discovery requests(1.4).
12/20/2012	3308.27	GPR	4.50	200.00	900.00	26613	Continue analysis of documents and pleadings and prepare and revise discovery requests (4.2); prepare correspondence to Kris Williams regarding draft and request feedback (.3).
12/28/2012	3308.27	GPR	0.20	200.00	40.00	26613	Continued investigation into Employer Services Assurance Company including telephone call to General Counsel Jay Morgan regarding indemnity protection and request for investigation of whether PEO was a member and covered under indemnity protection program.



12/31/2012	3308.27	GPR	0.20	200.00	40.00	26613	Review documents to determine years when policies were in place and prepare correspondence to Jay Morgan, Employer Services Assurance Company, requesting a cross reference of PEO against current and former accredited PEOs.
1/4/2013	3308.27	GPR	1.20	200.00	240.00	26682	Review scheduling order (.1); telephone call to Robert Byerts regarding need for additional time to respond to discovery requests (.2); receive and review email from Kris Williams regarding comments on discovery.
1/7/2013	3308.27	GPR	1.40	200.00	280.00	26682	Review and analyze comments of Kris Williams related to discovery requests (.2); revise discovery requests to include requests related to issues addressed by Ms. Williams (.6); receive and review email correspondence from Robert Byerts regarding proposal to extend all deadlines (.2); prepare correspondence to Kris Williams and Mark Tharp regarding revised discovery and proposal to extend deadlines (.4).
1/9/2013	3308.27	KAW	0.30	200.00	60.00	26682	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
1/10/2013	3308.27	GPR	1.40	200.00	280.00	26682	Attention to written discovery deadline extension and Simple HR's request to extend all deadlines by 120 days (.4); multiple telephone calls with Robert Byerts regarding the same (.4); telephone call with Mark Tharp regarding proposed extension (.2); correspondence with Kris Williams and Mark Tharp regarding extensions and regarding finalization of discovery requests to Simple HR (.4)
1/11/2013	3308.27	GPR	0.20	200.00	40.00	26682	Receive and review correspondence from the office of Robert Byerts and draft motion for new scheduling order.
1/14/2013	3308.27	GPR	0.80	200.00	160.00	26682	Receive and review draft Motions and Orders to extend scheduling order deadlines (.4); correspondence with Robert Byerts regarding drafts and revisions (.2); attention to finalization and transmittal of discovery requests to Simple HR (.2).
1/15/2013	3308.27	JOC	0.20	200.00	40.00	26682	Review status regarding discovery production / responses due.
1/18/2013	3308.27	GPR	0.60	200.00	120.00	26682	Correspondence with Robert Byerts regarding agreement on timing of discovery production.
1/18/2013	3308.27	GPR	0.20	200.00	40.00	26682	Update litigation status matrix with status and next steps.
1/28/2013	3308.27	GPR	0.60	200.00	120.00	26682	Receive and review correspondence from Kris Williams regarding document production and an example of privileged communication (.2); analysis of strategies for handling (.2); prepare correspondence to Ms. Williams regarding potential solution (.2).
1/31/2013	3308.27	KAW	0.30	200.00	60.00	26682	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.
2/4/2013	3308.27	GPR	0.20	200.00	40.00	27174	Overview of status of pending actions and next steps.
2/7/2013	3308.27	GPR	0.20	200.00	40.00	27174	Update PEO Litigation Tracking Matrix for forwarding to client.
2/11/2013	3308.27	JOC	0.30	200.00	60.00	27174	Review correspondence from attorney Robert Byerts regarding status and scheduling orders.
2/11/2013	3308.27	GPR	0.30	200.00	60.00	27174	Receive and review correspondence from Kris Williams regarding document production project and attachments that included lists and categories of responsive documents.
2/12/2013	3308.27	KAW	0.10	200.00	20.00	27174	Prepare for case review update. (split between Park Avenue and Imperial)
2/14/2013	3308.27	PHK	0.10	200.00	20.00	27174	Work on litigation strategy.
2/14/2013	3308.27	KAW	0.20	200.00	40.00	27174	Review litigation status of PEO lawsuit and the next step in the prosecution of the same.



2/14/2013	3308.27	JOC	0.60	200.00	120.00	27174	Review status and attention to production responses due February 21, 2013.
2/14/2013	3308.27	GPR	0.20	200.00	40.00	27174	Overview of status of matter and litigation tasks to be completed.
2/18/2013	3308.27	GPR	0.40	200.00	80.00	27174	Update litigation tracking report with current information in preparation for conference with Judge Davis (.2); correspondence with Robert Byerts regarding timing of discovery production (.2).
2/19/2013	3308.27	GPR	0.40	200.00	80.00	27174	Organize documents and prepare memoranda regarding insurance proposals, breakdown of amounts due, actuary reports, and surplus loan issues with respect to pending litigation.
2/20/2013	3308.27	GPR	0.50	200.00	100.00	27174	Attention to preparation of Responses to Requests for Documents and clawback agreement.
2/21/2013	3308.27	GPR	8.70	200.00	1740.00	27174	Review of documents and preparation of responses to Requests for Production of Documents.
2/22/2013	3308.27	GPR	2.50	200.00	500.00	27174	Research and analyze requirements for protective order with regard to the production of protected health information pursuant to HIPAA (1.0); prepare clawback provision (.5); prepare proposed Protective Order (1.0).
2/23/2013	3308.27	GPR	7.30	200.00	1460.00	27174	Continue review of documents and preparation of Responses to Request to Production of Documents (6.0); prepare transmittal correspondence to Robert Byerts including Responses to Requests for Production of Documents and proposed Protective Order (.6); strategize regarding preparation of production of documents (.7).
2/25/2013	3308.27	GPR	0.70	200.00	140.00	27174	Correspondence with Robert Byerts regarding delivery of production documents (.3); strategize regarding production (.2); finalize and transmit Responses to Requests for Production (.2).
2/27/2013	3308.27	GPR	1.40	200.00	280.00	27174	Receive and review Robert Byert's proposed revisions to the Confidentiality Agreement and Protective Order (.4); revise draft Confidentiality Agreement and Protective Order (.6); prepare correspondence to Mr. Byerts regarding revisions and regarding delivery of written Responses to Simple HR's Requests for Production and status of delivery of documents (.4).
2/28/2013	3308.27	GPR	3.20	200.00	640.00	27174	Receive and review correspondence from Robert Byerts regarding revisions especially regarding destruction or return of documents at the conclusion of the case (.2); attention to status of written Responses to Simple HR's Requests for Production (.2); strategize regarding preparation of documents for delivery (.6); continue review of potentially privileged emails (2.2).
3/1/2013	3308.27	GPR	1.20	200.00	240.00	27471	Memo to Pat Kernan regarding document production to Simple HR (.2); attention to preparation of documents for production (.8); prepare correspondence to Robert Byerts regarding status of production (.2).
3/4/2013	3308.27	PHK	0.50	200.00	100.00	27471	Work on Confidentiality Agreement and Protective Order
3/4/2013	3308.27	PHK	0.30	200.00	60.00	27471	Work on production of documents in response to discovery requests
3/5/2013	3308.27	PHK	0.50	200.00	100.00	27471	Preparation of Joint Motion to Enter Confidentiality Agreement and Protective Order
3/5/2013	3308.27	PHK	0.50	200.00	100.00	27471	Work on production of documents in response to Defendants RFP
3/6/2013	3308.27	PHK	0.50	200.00	100.00	27471	Work on production of data to be produced in response to RFP submitted by Defendant
3/6/2013	3308.27	JOC	0.30	200.00	60.00	27471	Work on prepayment credit calculation.

3/7/2013	3308.27	JOC	0.20	200.00	40.00	27471	Forward Notice of Filing Joint Motion for Protective Order by Park Avenue and Pyramid to Assistant Receiver Mark Tharp.
3/18/2013	3308.27	PHK	1.00	200.00	200.00	27471	work on response to Robert Byers regarding discovery responses
3/19/2013	3308.27	PHK	2.00	200.00	400.00	27471	Work on complete file review and evaluation of scheduling order to determine action needed to comply with same, and completion of discovery responses by Receiver to Defendant
3/20/2013	3308.27	JOC	0.30	200.00	60.00	27471	Attention to prosecution of case and scheduling order.
3/21/2013	3308.27	PHK	1.00	200.00	200.00	27471	Simple hr - work on discovery responses for Plaintiff
3/21/2013	3308.27	JOC	0.20	200.00	40.00	27471	Review revised Scheduling Order.
3/22/2013	3308.27	PHK	0.40	200.00	80.00	27471	Correspondence to Robert Byerts regarding his demand for additional discovery from Plaintiff
3/22/2013	3308.27	GPR	0.20	200.00	40.00	27471	Receive and review correspondence regarding receipt of documents and request for determination of completeness.
3/25/2013	3308.27	GPR	1.20	200.00	240.00	27471	Attention to production of documents in response to Simple HR's Requests for Production, including request from Robert Byerts to confirm production is complete and notice of potential deficiency (.6); attention to overall status of action including litigation pending prior to insolvency (.6).
3/25/2013	3308.27	GPR	0.30	200.00	60.00	27471	Attention to the preparation of discovery requests to Simple HR.
3/26/2013	3308.27	GPR	0.40	200.00	80.00	27471	Correspondence with Robert Byerts regarding document production and potential deficiencies.
4/4/2013	3308.27	JOC	0.40	200.00	80.00	27981	Attention to litigation strategy and case management.
4/4/2013	3308.27	GPR	1.60	200.00	320.00	27981	Strategize regarding discovery tasks to be completed and timing, including expected responses to discovery requests, preparation of privilege log, and categories of documents and topics to cover in the deposition of Simple HR's 30(b)(6) witnesses.
4/5/2013	3308.27	PHK	1.50	200.00	300.00	27981	Attention to case management to comply with scheduling order deadlines (.5); draft email correspondence to Defendant attorney Robert Byerts regarding 30(b)(6) deposition schedule (.5); work on subject matters to be covered in 30(b)(6) deposition (.5).
4/5/2013	3308.27	GPR	0.60	200.00	120.00	27981	Attention to preparation and timing of deposition of the corporate representative of Simple HR.
4/8/2013	3308.27	GPR	0.40	200.00	80.00	27981	Attention to finalization and transmission of a draft Rule 30(b)(6) Notice of Deposition to opposing counsel.
4/14/2013	3308.27	GPR	0.60	200.00	120.00	27981	Attention to finalization and transmittal of draft Notice of Deposition of Simple HR's corporate representative (.4); receive and review correspondence related to deposition (.2).
4/15/2013	3308.27	PHK	1.00	200.00	200.00	27981	Attention to draft email correspondence to Defendant attorney Robert Byerts regarding discovery issues related to 30(b)(6) Notice and deposition (.7); email correspondence from Byerts regarding same (.3).
4/18/2013	3308.27	GPR	0.20	200.00	40.00	27981	Meeting with Mark Tharp, Kris Williams, Matt Merlino, and Pat Kernan to analyze calculation and purpose of IBNR and effect of adjustment of the same with most recent data.
4/19/2013	3308.27	GPR	0.60	200.00	120.00	27981	Receive and review Simple HR's Responses to the Receiver's Discovery Requests.
4/30/2013	3308.27	JOC	0.30	200.00	60.00	27981	Review email correspondence from attorney Byerts regarding deposition and attention to same.

4/30/2013	3308.27	GPR	0.60	200.00	120.00	27981	Receive and review correspondence from Robert Byerts regarding scheduling of the 30(b)(6) deposition of Simple HR and strategize regarding location of deposition (.4); continue review of Simple HR's responses to discovery requests (.2).
5/3/2013	3308.27	PHK	0.50	200.00	100.00	28059	Telephone conference with attorney Robert Byerts regarding 30b6 scope of notice and scheduling of 30b6
5/3/2013	3308.27	GPR	1.40	200.00	280.00	28059	Conduct legal research and analysis regarding proper location of the deposition of the 30(b)(6) representative of a corporate party.
5/7/2013	3308.27	PHK	2.00	200.00	400.00	28059	Telephone conference with attorney Robert Byerts regarding discovery compliance and discovery schedule (.75); attention to email correspondence from Byerts regarding objections to Notice to Take 30b6 Deposition and related matters; response to Byerts (1.25)
5/7/2013	3308.27	JOC	0.30	200.00	60.00	28059	Review status regarding discovery dispute and schedule.
5/7/2013	3308.27	GPR	1.60	200.00	320.00	28059	Telephone conference with Pat Kernan and Robert Byerts regarding depositions of Simple HR's corporate representative, Mark Tharp and Matthew Merlino (.6); overview of facts and causes of action (.6); analysis regarding permissible scope of examination of a 30(b)(6) witness for a party (.2); receive and review correspondence from Mr. Byerts regarding deposition scheduling and position on scope of a 30(b)(6) deposition (.2).
5/8/2013	3308.27	GPR	0.20	200.00	40.00	28059	Receive and review memorandum regarding the scope of permissible testimony of a corporate representative, especially as it concerns testimony related to the legal basis for any particular claim or defense.
5/10/2013	3308.27	GPR	0.20	200.00	40.00	28059	Correspondence with Kris Williams regarding status of setting up depositions.
5/24/2013	3308.27	GPR	0.40	200.00	80.00	28059	Receive and analyze revised draft Merlino's & Associates report showing reduction of ultimate loss (.2); prepare memorandum regarding findings and implication for PEO lawsuits (.2).
6/5/2013	3308.27	JOC	0.30	200.00	60.00	28305	Review and follow up regarding issuance of discovery and depositions.
6/5/2013	3308.27	JOC	0.30	200.00	60.00	28305	Receive and review email correspondence and Judge White decision regarding 30(b)(6) deposition notice and preparation of 30(b)(6) corporate witness.
6/5/2013	3308.27	GPR	1.60	200.00	320.00	28305	Attention to coordination of discovery tasks and telephone calls and correspondence with opposing counsel regarding the same (1.2); analysis of updated projections of ultimate loss and potential implications for collection (.4).
6/6/2013	3308.27	GPR	0.60	200.00	120.00	28305	Continued attention to preparation for corporate representative depositions.
6/10/2013	3308.27	GPR	0.60	200.00	120.00	28305	Attention to preparation for depositions of corporate representatives.
6/11/2013	3308.27	GPR	0.60	200.00	120.00	28305	Attention to preparation of actuary expert report and use of Brett Miller as designated expert (.4); telephone call with Matt Merlino and Brett Miller regarding the same (.2).
6/12/2013	3308.27	PHK	1.00	200.00	200.00	28305	Correspondence from and to defense attorney Robert Byerts regarding scope of 30b6 deposition and deposition schedule and respond thereto (1)
6/12/2013	3308.27	GPR	0.40	200.00	80.00	28305	Attention to discovery status and strategy, including receipt and review of correspondence related to the same.
6/13/2013	3308.27	GPR	0.20	200.00	40.00	28305	Telephone call with Kris Williams regarding preparation of expert report of Mark Tharp.

6/17/2013	3308.27	GPR	2.80	200.00	560.00	28305	Attention to the finalization and transmittal of expert report of Brett Miller (.6); receive and review expert report of Mark Tharp (.8); attention to the finalization and transmittal of the expert report of Mark Tharp and exhibits (.6); prepare Final List of Expert Witnesses (.8).
6/17/2013	3308.27	GPR	1.00	200.00	200.00	28305	Analysis of Revised Actuary Report of Matt Merlino and Revised Summary of Amounts Due Report accounting for revised deductibles due and credit for GIM charges, and analyze any potential changes in litigation strategy as a result (.4); update litigation status tracking matrix especially regarding major developments in litigation as trial date approaches. (.6). (Split between Park Avenue and Imperial).
6/21/2013	3308.27	GPR	3.00	200.00	600.00	28305	Review of documents produced by Simple HR for purposes of preparing Final Witness and Exhibit List.
6/24/2013	3308.27	GPR	2.60	200.00	520.00	28305	Continue review of documents in preparation for list of exhibits and deposition of Simple HR's corporate representative.
6/25/2013	3308.27	PHK	1.00	200.00	200.00	28305	Work on discovery disputed with defense attorney Robert Byerts regarding scope of 30(b)(6) testimony of Mark Tharp and his expert witness testimony.
6/25/2013	3308.27	JOC	0.30	200.00	60.00	28305	Review status regarding depositions of assistant receiver.
6/25/2013	3308.27	GPR	1.00	200.00	200.00	28305	Attention to deposition of Receiver's witnesses, including analysis of request for separate deposition of Mark Tharp as expert.
6/26/2013	3308.27	PHK	1.00	200.00	200.00	28305	Work on discovery disputes with counsel for defendant; correspondence to and from Mark Tharp regarding 30(b)(6) and expert witness deposition.
6/26/2013	3308.27	GPR	6.40	200.00	1280.00	28305	Analysis regarding request by Robert Byerts for identification of witness to authenticate documents or alternatively a stipulation as to authenticity and recommended response requesting mutual stipulations (.4); continue review of documents for exhibit list and deposition of Simple HR's corporate representative (6.0). (Split between Park Avenue and Imperial).
6/27/2013	3308.27	PHK	2.50	200.00	500.00	28305	Review and analyze four notices to take deposition of receiver Mark Tharp as 30(b)(6) witness and as expert witness and depositions for expert witness Brett Miller (1.5); telephone conference and correspondence with Mark Tharp regarding these depositions and related matters (.5); correspondence to defendant attorney Robert Byerts regarding depositions (.5)
6/27/2013	3308.27	GPR	0.60	200.00	120.00	28305	Telephone call with Mark Tharp regarding use of Brett Miller as actuary expert and other discovery issues (.4); review of deposition notices and correspondence to Mark Tharp regarding the same (.2).
6/28/2013	3308.27	PHK	2.50	200.00	500.00	28305	Revision of 30b6 Notice to Take Deposition of Defendant and review and analysis of subject matters provided by Defendant for Receiver's 30b 6 deposition
6/28/2013	3308.27	PHK	1.00	200.00	200.00	28305	Work on discovery matters with defense attorney Robert Byerts regarding scope of 30b6 depositions, stipulations regarding authenticity of documents, and related matters
6/28/2013	3308.27	GPR	5.00	200.00	1000.00	28305	Revisions and finalization of Notice of Deposition for the corporate representative of Simple HR (2.0); review of document, pleadings, and written discovery for purposes of finalizing Notice of Deposition, deposition outline, and exhibits (1.4); begin preparation of outline of deposition examination of corporate representative (1.0); continue review of documents for potential exhibits (.6).

6/30/2013	3308.27	GPR	4.80	200.00	960.00	28305	Continue review of documents and preparation of Witness and Exhibit Lists.
7/1/2013	3308.27	PHK	6.00	200.00	1200.00	28808	Work on preparation for 30b6 depositions, and work on final witness and exhibit lists.
7/1/2013	3308.27	GPR	7.20	200.00	1440.00	28808	Continue review of documents and preparation of Final Witness and Exhibit Lists (5.0); finalize and file Final Witness and Exhibit Lists (1.5); review and analysis of areas of discovery for the deposition of Mark Tharp (.5); receive and review Final Witness and Exhibit List of Simple HR (.2).
7/2/2013	3308.27	PHK	3.15	200.00	630.00	28808	Analysis of exhibits listed by Defendant (.75); correspondence to and from defense counsel regarding production of Defendant exhibits (.5); preparation of amended notice to take deposition and correspondence to defense counsel (.5); correspondence to Mark Tharp and Pam Moore regarding location of documents listed as exhibits by Defendant (.4); extended telephone conference with Mark Tharp and Pam Moore regarding areas of inquiry listed by Defendant in its 30(b)(6) notice (1.00).
7/2/2013	3308.27	GPR	3.40	200.00	680.00	28808	Telephone call with Mark Tharp and Pam Moore regarding topics and preparation for the deposition of Mr. Tharp (1.4); begin organization of documents as potential exhibits for the deposition of Simple HR's corporate representative and trial, including location of files produced by PACA, Inc. (2.0).
7/3/2013	3308.27	PHK	2.00	200.00	400.00	28808	Work on discovery disputes with defense attorney Robert Byerts (1.0); preparation for 30(b)(6) deposition of defendant (1.0)
7/3/2013	3308.27	GPR	6.00	200.00	1200.00	28808	Review and prepare exhibits for deposition and trial; transmittal of documents to opposing counsel (5.4); attention to various matters regarding depositions and other discovery matters (.6).
7/5/2013	3308.27	PHK	3.00	200.00	600.00	28808	Prepare for 30(b)(6) deposition by review and analysis of documents produced by all parties.
7/5/2013	3308.27	GPR	0.20	200.00	40.00	28808	Attention to status of action and preparation of status update.
7/5/2013	3308.27	GPR	3.00	200.00	600.00	28808	Continue preparation for deposition of corporate representative of Simple HR, including location and review of additional documents (2.4); attention to preparation for the anticipated deposition of Wayne Stark (.6)
7/7/2013	3308.27	GPR	3.00	200.00	600.00	28808	Study of documents and correspondence in preparation for the deposition of corporate representative of Simple HR.
7/8/2013	3308.27	PHK	3.25	200.00	650.00	28808	Work on preparation for defendant 30(b)(6) deposition and the deposition of Wayne Stark (2.00); attention to preparation of objection to notice to take deposition of Wayne Stark (.75); correspondence to and from Robert Byerts regarding issues related to Wayne Stark deposition (.5).
7/8/2013	3308.27	PHK	0.10	200.00	20.00	28808	Attention to court approval of settlement agreement. (Split between Park Avenue and Imperial).
7/8/2013	3308.27	JOC	0.40	200.00	80.00	28808	Telephone call with Paul Wilkening regarding depositions and status.
7/8/2013	3308.27	JOC	0.40	200.00	80.00	28808	Review status regarding use of deposition of Wayne Stark in subsequent trial and adequate time allocation for cross examination.

7/8/2013	3308.27	GPR	5.20	200.00	1040.00	28808	Attention to the deposition of Brett Miller, Wayne Stark, Mark Tharp, and Monika Reitz (1.6); continued attention and preparation for exhibits for trial and deposition of corporate representative of Simple HR (1.0); continue preparation for the deposition of Simple HR's corporate representative (1.4); analysis and begin preparation of objection to the deposition of Wayne Stark (.8); prepare memorandum regarding Notice of Deposition of Wayne Stark and court's requirements for filing of objection (.4).
7/8/2013	3308.27	GPR	0.20	200.00	40.00	28808	Analysis of status and strategic planning for next steps to take in litigation.
7/9/2013	3308.27	PHK	2.50	200.00	500.00	28808	Preparation for 30(b)(6) deposition of Defendant (2 hours); telephone conference and correspondence to defendant attorney Robert Byerts regarding issues related to the Wayne Stark deposition (.5).
7/9/2013	3308.27	GPR	3.80	200.00	760.00	28808	Preparation of Notice of Deposition of Wayne Stark to be recorded by video (.8); continue preparation for deposition of Simple HR's corporate representative (3.0).
7/10/2013	3308.27	PHK	10.00	200.00	2000.00	28808	Preparation for deposition of Wayne Stark, Mark Tharp, Brett Miller, and Monika Reitz by review of key documents produced in discovery and analysis of opinion issued by Judge Heaton on surplus loan.
7/10/2013	3308.27	GPR	10.00	200.00	2000.00	28808	Continue preparation for deposition of Simple HR's corporate representative, including preparation of additional documents to be introduced and documentary research.
7/11/2013	3308.27	PHK	10.00	200.00	2000.00	28808	Preparation for and attendance at deposition of Simple HR 30(b)(6) witness Bill Lindsley.
7/11/2013	3308.27	GPR	10.00	200.00	2000.00	28808	Final preparation and in deposition of Simple HR's corporate representative, Bill Lindsley.
7/12/2013	3308.27	PHK	8.00	200.00	1600.00	28808	Analysis of 30(b)(6) witness Bill Lindsley testimony and preparation for deposition of witness Wayne Stark.
7/12/2013	3308.27	GPR	6.00	200.00	1200.00	28808	Analysis of testimony at deposition of Bill Lindsley and preparation of memoranda to Mark Tharp and Brett Miller regarding expected lines of questioning regarding, among other things, open claim reserves and calculation of IBNR (3.0); begin analysis and preparation of Statement of Material Facts for Motion for Summary Judgment (2.6); attention to the deposition of Monika Reitz (.4).
7/14/2013	3308.27	GPR	5.00	200.00	1000.00	28808	Preparation for the deposition of Wayne Stark.
7/15/2013	3308.27	PHK	6.00	200.00	1200.00	28808	Attendance at meeting with Pegasas receiver Terry Smith to discuss issues related to Wayne Stark (1 hour); preparation for Wayne Stark deposition by review and analysis of prior allegations made in the 2009 litigation involving PACA and Wayne Stark, review of critical emails, and related agreements among SimpleHR, PACA, PHI and PPC (5 hours).
7/15/2013	3308.27	GPR	4.60	200.00	920.00	28808	Meeting with Terry Smith regarding Wayne Stark in preparation for deposition (1.2); prepare correspondence to Mr. Smith regarding draft assignment of collateral and claims for review and comment by John Ratzel (.4); continued attention and preparation for the deposition of Wayne Stark including coordination of pleadings and other filings involving PACA/Skilstaf (1.0); review of Simple HR's Witness and Exhibit List (.4); prepare and file Witness and Exhibit List (.8); attention to the preparation of Monika Reitz for deposition (.4); telephone call with Brett Miller regarding deposition and testimony regarding open claims and development factors (.4).

7/16/2013	3308.27	PHK	8.00	200.00	1600.00	28808	Preparation for deposition of witness Wayne Stark by detailed review and analysis of all relevant documents, including pleadings in the prior 2009 litigation and all discovery responses as well as key documents from the insurer.
7/16/2013	3308.27	GPR	9.00	200.00	1800.00	28808	Continue preparation for deposition of Wayne Stark including strategic review of pleadings and identification of exhibits to introduce.
7/17/2013	3308.27	PHK	10.00	200.00	2000.00	28808	Continued preparation for deposition of Wayne Stark.
7/17/2013	3308.27	GPR	10.00	200.00	2000.00	28808	Continued preparation for the deposition of Wayne Stark.
7/18/2013	3308.27	PHK	10.00	200.00	2000.00	28808	Preparation for deposition of Wayne Stark and cross examination of Wayne Stark at deposition.
7/18/2013	3308.27	GPR	9.00	200.00	1800.00	28808	In deposition of Wayne Stark (8.0); Review and analysis of testimony and effect on litigation, including telephone call with Kris Williams (1.0).
7/19/2013	3308.27	PHK	6.00	200.00	1200.00	28808	Attention to the deposition of Wayne Stark.
7/19/2013	3308.27	GPR	6.00	200.00	1200.00	28808	Attention to the deposition of Wayne Stark.
7/22/2013	3308.27	GPR	0.60	200.00	120.00	28808	Receive and review draft Motion to Extend Dispositive Motion and Daubert Motion Deadlines (.4); correspondence with Robert Byerts regarding the same (.2).
7/23/2013	3308.27	JOC	0.30	200.00	60.00	28808	Conference with Assistant Receiver Mark Tharp and Pat Kernan during expert witness deposition regarding examination.
7/24/2013	3308.27	PHK	4.00	200.00	800.00	28808	Preparation of Mark Tharp for receiver 30(b)(6) deposition
7/24/2013	3308.27	GPR	5.00	200.00	1000.00	28808	Preparation for Deposition of Mark Tharp as corporate representative.
7/25/2013	3308.27	PHK	10.00	200.00	2000.00	28808	Preparation for and attendance at 30 b 6 deposition of Mark Tharp
7/25/2013	3308.27	GPR	10.00	200.00	2000.00	28808	In deposition of Mark Tharp as corporate representative (7.0); preparation for deposition of Mark Tharp as expert (.6); strategize regarding business shutdown of Pyramid Diversified Services and conduct investigation into corporate successor doing business as Simple HR (2.4).
7/26/2013	3308.27	PHK	6.00	200.00	1200.00	28808	Preparation for and attendance at expert witness deposition of Mark Tharp
7/26/2013	3308.27	JOC	0.30	200.00	60.00	28808	Attention to assets of Simple HR and possible asset investigation.
7/26/2013	3308.27	JOC	0.30	200.00	60.00	28808	Analysis regarding addition of Simple HR successor entity under successor liability theory.
7/26/2013	3308.27	GPR	3.40	200.00	680.00	28808	Attention to pursuing HR3, Inc. as a successor entity liable for payment of deductibles and premiums (2.0); correspondence and telephone call with Brett Miller regarding preparation for deposition, including adjustment to reserves and effect upon IBNR (1.0); receive and review Notices canceling the depositions of Brett Miller and Monika Reitz (.4); email correspondence with Monika Reitz regarding cancellation of deposition (.2); email correspondence with Brett Miller regarding cancellation of deposition (.2).
7/29/2013	3308.27	TMW	1.10	200.00	220.00	28808	Review facts of case in preparation for drafting Motion for Leave to Amend to Add HR3 as additional defendant.
7/29/2013	3308.27	PHK	1.00	200.00	200.00	28808	Work on Motion to Join successor defendant corporation as indispensable party.
7/29/2013	3308.27	GPR	1.00	200.00	200.00	28808	Attention to preparation of Motion to Amend Complaint and preparation of Amended Complaint to add HR3, Inc. and specific claims against this new Simple HR entity.
7/30/2013	3308.27	TMW	8.10	200.00	1620.00	28808	Draft Motion for Leave to Amend Out of Time to Add HR3 as additional defendant.



7/30/2013	3308.27	PHK	1.00	200.00	200.00	28808	Review and evaluate deposition testimony from Bill Lindsley, Wayne Stark and Mark Tharp to plan Motions in Limine and Despositive Motions.
7/30/2013	3308.27	PHK	0.50	200.00	100.00	28808	Work on preparation of Motion to Join Indispensable Party.
7/30/2013	3308.27	GPR	0.60	200.00	120.00	28808	Continued attention to analysis and preparation of Motion to Amend Petition and Amended Petition to name and assert claims against HR3, Inc. (.2); review of documents recently produced by Simple HR (.4).
7/31/2013	3308.27	TMW	6.50	200.00	1300.00	28808	Review and edit draft Motion for Leave to Amend to Add HR3 as Additional Defendant. Research issues related to amending out of time in the interests of justice and equity and successor liability for brief.
7/31/2013	3308.27	TMW	1.50	200.00	300.00	28808	Revise Motion for Leave to Amend out of Time to Add HR3 as Additional Defendant per comments from Jerrick Irby.
8/1/2013	3308.27	TMW	6.20	200.00	1240.00	28929	Draft Motion for Leave to Amend Out of Time to add HR3 as additional Defendant.
8/1/2013	3308.27	TMW	0.80	200.00	160.00	28929	Draft Amended: Petition to include HR3 as successor liability entity. Research successor liability and continuation of business enterprise pursuant to Florida law.
8/2/2013	3308.27	TMW	5.20	200.00	1040.00	28929	Draft additional language in response to Plaintiff's Motion for Leave to Amend. Revise draft per comments from Jerrick Irby. Perform cite check of case sources and internal references. Forward to Greg Reilly for review.
8/2/2013	3308.27	GPR	0.40	200.00	80.00	28929	Attention to preparation of Motion for Leave to Amend Pleadings to include successor entity and claims.
8/5/2013	3308.27	TMW	3.40	200.00	680.00	28929	Review and revise Motion for Leave to Amend per comments from Greg Reilly. Check case citations from revisions and internal citations per reorganization of Motion. Draft and revise Amended Petition for attachment to Motion for Leave to Amend to include claim of Successor Liability and request temporary injunction.
8/5/2013	3308.27	TMW	1.10	200.00	220.00	28929	Research Florida Law regarding temporary injunctions for incorporation into Amended Petition.
8/5/2013	3308.27	PHK	1.00	200.00	200.00	28929	Work on Motion to join additional party defendant and Amended Complaint.
8/5/2013	3308.27	GPR	1.40	200.00	280.00	28929	Review and revise Motion for Leave to Amend Pleading Out of Time and attention to preparation of proposed Amended Complaint.
8/6/2013	3308.27	TMW	3.50	200.00	700.00	28929	Review Motion for Leave to Amend with Pat Kernan, revise per comments from Pat, compile exhibits for Motion and file.
8/6/2013	3308.27	PHK	1.00	200.00	200.00	28929	Work on preparation of Motion to Join Indispensible Party and proposed Amended Complaint.
8/19/2013	3308.27	JOC	0.60	200.00	120.00	28929	Review status and analysis regarding strategy regarding successor liability.
8/27/2013	3308.27	GPR	0.50	200.00	100.00	28929	Receive and review Simple HR's Response to the Receiver's Motion for Leave to Amend Complaint Out of Time.
8/28/2013	3308.27	GPR	3.40	200.00	680.00	28929	Conduct legal research and prepare memorandum regarding responsibilities for costs of depositions (.4); review transcripts and documents for filing Motion for Summary Judgment (3.0).
8/29/2013	3308.27	TMW	1.50	200.00	300.00	28929	Read and analyze PDS response to Motion for leave to amend in order to draft response.
8/29/2013	3308.27	TMW	2.50	200.00	500.00	28929	Review and analyze Defendant's Response to Plaintiff's Motion for Leave to Amend. Evaluate claims and research case law cited.
8/29/2013	3308.27	PHK	0.50	200.00	100.00	28929	Telephone conference with Robert Byerts regarding his request for additional time to file summary judgment in Daubert Motions and length of briefs of be filed.

8/29/2013	3308.27	JOC	3.30	200.00	660.00	28929	Draft outline for Reply Brief to Defendant's Reply; outline argument and research case law for each rebuttal.
8/29/2013	3308.27	GPR	7.40	200.00	1480.00	28929	Attention to preparation of Reply brief in support of Motion to Amend Pleadings (.4); continue review of deposition transcripts and documents in preparation for filing Motion for Summary Judgment (6.4); attention to extending time to file Motion for Summary Judgment by one day, including review of joint motion (.6).
8/30/2013	3308.27	TMW	8.20	200.00	1640.00	28929	Research case law and analyze argument for Reply to Defendant's Response to Plaintiff's Motion for Leave to Amend Out of Time.
8/30/2013	3308.27	GPR	5.40	200.00	1080.00	28929	Continue review of documents and preparation of Motion for Summary Judgment (5.0); correspondence with Kris Williams regarding modification of the amounts due as a result of the settlement of claimant for less than reserves and other accounting issues (.4).
8/31/2013	3308.27	TMW	7.20	200.00	1440.00	28929	Draft outline of case law for Reply brief, analyze Defendant's argument and draft Reply addressing issues raised in Defendant's Response.
8/31/2013	3308.27	GPR	8.00	200.00	1600.00	28929	Continue analysis and preparation of Motion for Summary Judgment.
9/1/2013	3308.27	GPR	3.00	200.00	600.00	29541	Continue preparation of Motion for Summary Judgment.
9/2/2013	3308.27	GPR	7.60	200.00	1520.00	29541	Continue preparation of Motion for Summary Judgment.
9/3/2013	3308.27	TMW	4.80	200.00	960.00	29541	Review and revise reply to Defendants Response to Motion for Leave to Amend. Draft Proposed Order
9/3/2013	3308.27	PHK	1.00	200.00	200.00	29541	Work on reply to response of defendant to Plaintiff's motion to join additional party.
9/3/2013	3308.27	GPR	10.00	200.00	2000.00	29541	Analyze and revise Reply in support of Motion to Amend (2.4); continue preparation of Motion for Summary Judgment (7.6).
9/4/2013	3308.27	GPR	9.40	200.00	1880.00	29541	Finalize and file Motion for Summary Judgment.
9/5/2013	3308.27	GPR	1.60	200.00	320.00	29541	Attention to preparation and delivery of Motion for Summary Judgment for Judge Heaton (.6); receive and review order granting leave to extend page limit (.2); receive and review Simple HR's Partial Motion for Summary Judgment (.8).
9/10/2013	3308.27	GPR	0.50	200.00	100.00	29541	Continue review of Simple HR's Motion for Partial Summary Judgment
9/17/2013	3308.27	GPR	1.80	200.00	360.00	29541	Analysis and preparation of memorandum regarding case scheduling and events that could alter the scheduling order (.6); receive and review order granting Simple HR's request to file sur-reply on the Receiver's Motion to Amend Pleadings to add HR3 and review and analysis of draft sur-reply (.6); analysis regarding stay of receivership actions, effect it may have on trial setting, and potential alternatives (.6).
9/18/2013	3308.27	PHK	0.20	200.00	40.00	29541	Review status and determine next actions.
9/18/2013	3308.27	JOC	0.20	200.00	40.00	29541	Review status and determine next actions.
9/18/2013	3308.27	GPR	0.40	200.00	80.00	29541	Strategize regarding status and prosecution of the action, including analysis of receivership court's order staying all hearings on applications in the receivership proceeding (.2); prepare matter status update (.2).
9/23/2013	3308.27	GPR	6.70	200.00	1340.00	29541	Continued analysis of Simple HR's Motion for Partial Summary Judgment and preparation of Response.

9/25/2013	3308.27	PHK	1.75	200.00	350.00	29541	Correspondence to Robert Byerts regarding extension of time to file response to Daubert motions and response to Defendant's Summary Judgment (.5); extended telephone conference with Robert Byerts regarding extension of certain deadlines in the Scheduling Order (.5); preparation, review, revision of joint motion to extend certain deadlines in Scheduling Order and file with the Court (.75).
9/25/2013	3308.27	GPR	2.00	200.00	400.00	29541	Attention to preparation of Response to Motion for Summary Judgment and Response to Daubert Motion (.2); telephone call with Robert Byerts regarding summary judgment motions, pending motion to amend the pleadings and trial preparation materials in light of current scheduling order (.5); continue analysis and preparation of Response to Motion for Partial Summary Judgment (1.0); Review and revise Joint Motion regarding scheduling issues (.3).
9/27/2013	3308.27	GPR	9.40	200.00	1880.00	29541	Continue review of documents and transcripts and preparation of Response to Simple HR's Motion for Partial Summary Judgment.
9/28/2013	3308.27	GPR	9.00	200.00	1800.00	29541	Continue preparation of Response to Simple HR's Motion for Partial Summary Judgment.
9/29/2013	3308.27	GPR	1.20	200.00	240.00	29541	Continue preparation of Response to Simple HR's Motion for Partial Summary Judgment.
9/30/2013	3308.27	PHK	4.00	200.00	800.00	29541	Work on response to defendant's Daubert Motion against Mark Tharp opinions (4.).
9/30/2013	3308.27	JOC	0.20	200.00	40.00	29541	Draft correspondence to Paul Wilkening regarding progress to be made / deadlines for this week.
9/30/2013	3308.27	GPR	10.00	200.00	2000.00	29541	Continue preparation of Response to Simple HR's Motion for Partial Summary Judgment, including selection and coordination of exhibits.
10/1/2013	3308.27	PHK	6.00	200.00	1200.00		Work on response brief to Defendant's Daubert Motion against Mark Tharp opinions including preparation of exhibits to be attached.
10/1/2013	3308.27	GPR	9.40	200.00	1880.00		Finalize and file Response to Simple HR's Motion for Partial Summary Judgment (8.4); review, revise, and file Response to Simple HR's Motion to Exclude Expert Testimony of Mark Tharp (1.0).
10/2/2013	3308.27	JOC	0.20	200.00	40.00		Review revised scheduling order and forward to Mark Tharp and Paul Wilkening.
10/2/2013	3308.27	JOC	0.50	200.00	100.00		Review status regarding new scheduling order and legal issues to be brought before the Court.
10/2/2013	3308.27	GPR	2.40	200.00	480.00		Receive and review Simple HR's Response to the Receiver's Motion for Summary Judgment (.8); strategize regarding preparation of arguments for Reply (.6); receive and review Court's Order extending deadlines (.4); strategize regarding tasks to be completed in short order due to Court's limited expansion of deadlines (.6).
10/3/2013	3308.27	PHK	1.50	200.00	300.00		Preparation of case status report to Mark Tharp, including evaluation and analysis of all pending motions with the court and a timeline of events leading up to jury trial in December.
10/3/2013	3308.27	GPR	1.20	200.00	240.00		Attention to gathering documents to be used at trial (.4); strategize regarding presentation of evidence for Judge Heaton, and judicial demeanor in recent hearings in unrelated actions involving the Receiver (.4); continued analysis in preparation for filing Reply to Motion for Summary Judgment (.4).
10/5/2013	3308.27	GPR	3.10	200.00	620.00		Analysis and preparation of Reply in Support of the Receiver's Motion for Summary Judgment.

10/7/2013	3308.27	GPR	2.60	200.00	520.00	Continue analysis and preparation of Reply in Support of the Receiver's Motion for Summary Judgment.
10/9/2013	3308.27	GPR	4.80	200.00	960.00	Continue legal research, analysis, and preparation of Reply in Support of the Receiver's Motion for Summary Judgment (4.4); receive and review Simple HR's Reply in Support of Its Motion for Summary Judgment (.4).
10/11/2013	3308.27	TMW	0.60	200.00	120.00	Draft discovery requests for identifying successor liability entities for identification and action prior to statute of limitations deadline. Forward to Jon Payne for review.
10/15/2013	3308.27	JOC	0.40	200.00	80.00	Review an analysis regarding issues and status of trial preparation.
10/17/2013	3308.27	GPR	0.60	200.00	120.00	Receive and review Orders requiring Simple HR to revise its responses to the Receiver's Statement of Undisputed Material Facts (.2); review of briefings on Motions for Summary Judgment (.4).
10/22/2013	3308.27	JOC	0.50	200.00	100.00	Review Defendant's Response to Motion for Summary Judgment, paying particular attention to handling of developed losses and surplus loans.
10/24/2013	3308.27	GPR	0.40	200.00	80.00	Begin review of corrected Response to the Receiver's Motion for Summary Judgment to determine revisions and necessity of filing new Reply.
10/25/2013	3308.27	GPR	0.40	200.00	80.00	Continue analysis and strategy for filing Reply in support of Motion for Summary Judgment.
10/28/2013	3308.27	GPR	1.20	200.00	240.00	Review comparison of Simple HR's Responses to the Receiver's Motion for Summary Judgment to determine if re-filing and revision to the Receiver's Reply is warranted.
11/1/2013	3308.27	PHK	5.00	200.00	1000.00	Review depositions of Wayne Stark and Bill Lindsley and prepare designations of deposition testimony and file pursuant to the scheduling order
11/1/2013	3308.27	GPR	1.40	200.00	280.00	Strategize regarding preparation and filing of deposition designations of Wayne Stark and Bill Lindsley (.8); finalize and file Deposition Designations of Wayne Stark (.3); finalize and file Deposition Designations of Bill Lindsley (.3).
11/3/2013	3308.27	JOC	0.30	200.00	60.00	Review status report regarding the approaching jury trial.
11/5/2013	3308.27	PHK	0.50	200.00	100.00	Work on preparation of motion in limine and objections to deposition designations in compliance with scheduling order
11/6/2013	3308.27	PHK	1.50	200.00	300.00	work on preparation of pretrial conference order (1); research and analysis of application of Denney 'no fraud as a defense' rule as applied in banking receiverships to insurance receiverships to assert new argument against fraud defenses (.5)
11/6/2013	3308.27	GPR	0.40	200.00	80.00	Attention to preparation of proposed pretrial order and receive and review correspondence with Robert Byerts regarding the same
11/7/2013	3308.27	PHK	4.00	200.00	800.00	Work on preparation of final pretrial order and counter-designations and objections to deposition designations
11/7/2013	3308.27	GPR	2.00	200.00	400.00	Trial preparation, including determination of likely docket call and trial commencement date, review of trial rules and guidelines, and contents of a pretrial report.
11/8/2013	3308.27	GPR	5.80	200.00	1160.00	Begin preparation of proposed Pretrial Report.
11/10/2013	3308.27	PHK	3.00	200.00	600.00	Review and evaluation of all relevant documents and pleadings as part of the preparation of a final pretrial order
11/10/2013	3308.27	GPR	2.00	200.00	400.00	Continue preparation of proposed Pretrial Report.
11/11/2013	3308.27	PHK	4.00	200.00	800.00	Work on and finalize counter designations of deposition testimony of Wayne Stark and William Lindsley in compliance with scheduling order
11/11/2013	3308.27	GPR	3.20	200.00	640.00	Continue preparation of Pretrial Report.

11/12/2013	3308.27	GPR	4.80	200.00	960.00	Continue preparation of proposed Pretrial Report (4.2); telephone call with Robert Byerts regarding Pretrial Report, docket call, and preparation for trial ahead of ruling on motions for summary judgment (.4); correspondence with Mr. Byerts regarding preparation of Pretrial Report and jury demand (.2).
11/14/2013	3308.27	PHK	1.50	200.00	300.00	Review and analysis of 26 page Summary Judgment opinion from Judge Heaton (1); conference with Mark Tharp and Greg Reilly regarding consequences of order (.5)
11/14/2013	3308.27	PHK	1.50	200.00	300.00	Work on preparation and finalizing pretrial order (1.5); correspondence to and from Robert Byerts regarding defendant's input into pretrial order (.5)
11/14/2013	3308.27	GPR	3.40	200.00	680.00	Review and revise Simple HR's draft of the Pretrial Report, including insertion of objections (1.8); correspondence with Robert Byerts regarding revisions (.2); receive and review detailed opinion and Order of the Court Granting the Receiver's Motion for Summary Judgment
11/19/2013	3308.27	TMW	3.00	200.00	600.00	Research regarding certification of question to Oklahoma Supreme Court for interpretation of 36 O.S. 3621.
11/19/2013	3308.27	GPR	0.80	200.00	160.00	Analysis regarding Judge Heaton's ruling on the invalidity of the insurance Agreements and strategy for reconsideration, appeal, or motion to certify (.6); correspondence regarding the issue to Mark Tharp and Kris Williams (.2); prepare draft Judgment to be filed ( _ )
11/20/2013	3308.27	PHK	2.80	200.00	560.00	Analysis of Judge Heaton's Order regarding the effect of 36 OS 3621 and various legal arguments to assert in a motion to reconsider Order and motion to certify question regarding 3621to Oklahoma Supreme Court (2); telephone conference with Mark Tharp, Kris Williams, John O'Connor regarding same (.5); review and revise proposed Judgment (.3)
11/20/2013	3308.27	JOC	0.50	200.00	100.00	Review and analysis regarding implications of Judge Heaton ruling regarding IBNR.
11/20/2013	3308.27	JOC	0.40	200.00	80.00	Review analysis regarding discount to manual premium.
11/20/2013	3308.27	GPR	4.80	200.00	960.00	Prepare Judgment pursuant to the Court's Order granting the Receiver's Motion for Summary Judgment, including procedural research regarding request for attorney fees (2.4); email correspondence with Robert Byerts regarding preparation of Judgment (.2); Review of policies to determine whether deductible premium discount is included (.4); strategize regarding Judge Heaton's ruling and filing of a Motion to Reconsider to allow enforcement of the Agreements, certify the question to the Oklahoma Supreme Court, or, alternatively, charge premiums at the policy rate (.4); telephone call with Mark Tharp and Kris Williams regarding ruling and recommendation for handling (.6); review of pleadings in the Consedine case to locate copy of policy used (.8).
11/21/2013	3308.27	GPR	5.60	200.00	1120.00	Revise proposed Judgment (.4); correspondence with Robert Byerts regarding revisions and submission to Judge Heaton (.2); continue analysis of Consedine case, including telephone call to counsel for Louisiana receiver to obtain copy of policies at issue (2.0); detailed review and analysis of policies, premium audits, and other documents to develop argument for Motion for Reconsideration (3.0).

11/22/2013	3308.27	GPR	3.80	200.00	760.00	Continue analysis of facts and potential arguments to support a Motion to Reconsider (1.8); review policies at issue in the Consedine Case (.8); conduct online research of NCCI codes applicable to large deductible policies (.8); correspondence with Kris Williams regarding NCCI codes (.4).
11/25/2013	3308.27	PHK	1.00	200.00	200.00	Telephone conference with Robert Byerts regarding content of Judgment to be submitted to the Court (.5); work on motion to reconsider summary judgment (.5)
11/25/2013	3308.27	GPR	0.40	200.00	80.00	Update case status and activity contemplated to advance litigation.
11/25/2013	3308.27	GPR	1.00	200.00	200.00	Correspondence with Robert Byerts regarding revisions to proposed Judgment (.4); telephone call with Robert Byerts regarding form of proposed Judgment and grounds for reconsideration (.4); prepare correspondence submitting proposed Judgment to the Court (.2).
11/26/2013	3308.27	JOC	0.40	200.00	80.00	Review Judgment entered by Judge Heaton in favor of Receiver.
12/5/2013	3308.27	GPR	4.30	200.00	860.00	Analysis and preparation of Motion to Reconsider.
12/6/2013	3308.27	GPR	0.40	200.00	80.00	Receive and review Simple HR's Motion to Amend or Alter the Judgment.
12/9/2013	3308.27	PHK	1.00	200.00	200.00	Receipt and review Defendant's Motion to Alter Judgement and brief in support
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